



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

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By ECF

The Honorable Mary Kay Vykocil
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *American Civil Liberties Union et al. v. United States Department of Justice et al.*,
No. 19 Civ. 5483 (MKV)

Dear Judge Vyskocil:

This Office represents the Government in the above-referenced case brought under the Freedom of Information Act ("FOIA"). I write respectfully to request an extension of the briefing deadlines previously set for the parties' cross motions for summary judgment. The parties have continued to confer and have made additional progress this week to narrow the set of withholdings and FOIA exemptions in dispute. The Government anticipates shortly reprocessing certain records, which will further limit the issues requiring resolution by the Court. Accordingly, the Government requests, with Plaintiffs' consent, a one-week extension of the deadline to file its motion for summary judgment, from October 9 to October 16, 2020. The parties propose adjusting the remaining deadlines as follows:

- Plaintiffs' combined cross-motion and opposition, from October 23 to October 30, 2020;
- The Government's combined opposition and reply, from November 6 to November 11, 2020;
- Plaintiffs' reply from November 20 to November 25, 2020.

This is the first request for an extension of the briefing deadlines.

We thank the Court for its consideration of this request.

Granted. SO ORDERED.

Date: 10/8/2020
New York, New York


Mary Kay Vyskocil
United States District Judge

Respectfully,

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Acting United States Attorney

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